

EXHIBIT C

To Lilly Human Resources Department:

Listed below is documentation regarding my manager, Dan Tubridy. As you will see, Dan's behavior during his tenure as Sacramento District Long Term Care District Manager since early 2001 has been somewhat unprofessional. He has displayed favoritism toward the men of the team and made the women feel unappreciated, undervalued, and uncomfortable. At this point, I have no respect for this manager and feel quite uncomfortable and demotivated reporting to him. His values clearly do not reflect those of Eli Lilly: particularly Integrity and Respect for People. As a result, I have decided to share this information with the company's Human Resources Department.

June 19, 2001

Sales meeting in Las Vegas, NV

Most members of our team (Beth Merino, Holly Burkhart, Tanya Calandra, Tremell Turner, and Bryan Zappulla) went out for refreshments at Caesar's Palace after dinner. We stayed and enjoyed each other's company for a couple of hours. The women of the team noticed that Dan had taken his wedding ring off sometime during the evening and left our table to attempt to create conversation with some women who were seated near us. While Dan's choice of what to do with his personal time is his own, he was completely unaware of the image he was creating for himself by exhibiting this behavior in the presence of his new subordinates.

Around midnight Dan asked Tremell and Bryan to break off with him to go someplace else without the women of the team. As we were all new to the team and wanted to make a good impression with our new manager, Tremell and Bryan agreed to go with Dan. Dan kept them out until 5:30 a.m. the next morning. Dan called me early the next morning and asked me to contact the rest of the team to announce that our meeting would be starting an hour later than scheduled. When the meeting finally did begin, the three were terribly exhausted and unable to concentrate. I was scheduled to give my first team presentation that morning, although I had to cut it short since we were now short on time. I gave my presentation, although many were not able to concentrate. One person actually fell asleep while I was presenting. We later learned that Dan had taken the three of them to a "gentlemen's club" where they passed the night away. This set the tone in our minds (the women of the team) as to the level of respect that Dan has for women in general. We have felt quite uncomfortable around him ever since that evening. We also felt that this behavior was extremely unprofessional for a manager as it clearly interfered with the progress of our meeting and our (the women of the team) level of respect for him as a manager.

Week of January 7, 2002

Territory Overviews with Dan

Those of us who live near the Sacramento district office (Beth Merino, Maggie Bolton, Tanya Calandra and myself) were all scheduled to drive to the office for a territory overview with Dan. For Tanya, this was actually a three-hour drive. Although Bryan Zappulla lived only a 45-minute drive away from the Sacramento office at the time, Dan had Bryan fly all the way to Las Vegas for his territory review. Dan also flew Holly Burkhart from Salt Lake City into Las Vegas for her review. Holly asked if Dan would

pay for her to spend the night in Vegas since a round trip from Salt Lake City to Las Vegas all in one day was a bit exhausting. Dan told Holly that he would not be able to justify having the company pay for her room and that if she wanted to stay, she would have to pick up the cost on her own. Holly chose to fly back that same day. Dan told Bryan, however, that he would be happy to pay for his hotel room for the evening (despite the fact that it is less than a 2-hour flight from Vegas to No. CA) and that he wanted to go "out on the town" with Bryan and Tremell that evening. Having wives at home, neither of them really wanted to do this, despite the fact that Dan put tremendous pressure on them to do so. In flying Bryan all the way to Las Vegas for his review and paying for his room, not only did Dan waste Lilly dollars, he once again displayed tremendous discrimination and favoritism for the men of the team.

Q3, 2001

In the Long Term Care Division, responsibility for accounts is often a gray area. Some accounts are shared depending on what percentage of their business lies where, while others are not. During my first year in the field, I worked very closely with my pharmacy directors to determine exactly where their business comes from in order to best identify how responsibility for these accounts should be shared, if at all. Sometime during 2001, Dan Tubridy had a conversation, without my knowledge, with Robert Elorreaga of Southern California to determine how an account out of San Diego, Resource Pharmaceuticals, should be shared with Northern California. Since Resource provides all the refills to the Sunscript Pharmacy accounts in Northern California, Robert felt strongly that at least one Northern California LTC rep should share responsibility for this account. Since the Northern California Sunscript pharmacy physically sits in my geography, Dan and Robert made the decision, without my knowledge or input, to add this account to my accountability profile.

Dan never had the courtesy or professional respect to inform me of this decision. I only found out because the account mysteriously appeared in my TUR reports the next time data was sent out to the LTC reps. I called Dan immediately to ask why this account had been posted to my accountability profile. Dan explained that he and Robert made the decision based on the fact that the Northern California Sunscript account sits in my geography. I explained to Dan, (not for the first time), that although this pharmacy physically sits in my geography, only about 5% of their business actually takes place in my geography. The other 95% is completely out of my control. Which meant that of the business that Resource Pharmaceuticals handled out of San Diego, only about 2% at best actually came from my geography. Dan agreed that perhaps this account shouldn't be shared with me but that it needed to be shared with SOMEONE, and since the northern California facility lied in my territory, I was probably the best choice. After some discussion and argument, Dan finally agreed to have this account removed from my accountability profile. However, this did not occur until the beginning of Q4. Since Resource Pharmaceuticals performed poorly in Q3, it caused my performance for Zyprexa sales to come up short for Q3, dramatically impacting my professional ranking and Premier Rewards. Rather than do the fair thing which would have been to remove this account retroactively and pay me the rewards I should have been due based on the performance in my territory, the decision was made to leave the data as-is for Q3 and

basically allow me to "eat the loss." I can't stress enough how demotivated I felt after that incident.

January 23, 2002

Sales meeting in San Francisco, CA

The ladies of the team (Beth Merino, Holly Burkhart, Charmayne Rauch, and myself), Dan Tubridy, and Scott Reese went out to a nightclub called The Starlight Room. For this particular evening out, Bryan and Tremell told Dan they did not want to go. Since they were both married, and Dan always insisted on dragging them to places their wives didn't appreciate them frequenting, they decided to avoid the situation altogether by staying at the hotel. After a couple of hours (at about 11:15 p.m.), we were all ready to leave except for Dan. Our group (minus Dan who stayed behind because he was having a conversation with a strange woman at the bar) walked the two blocks back to our hotel and retired for the evening. I was rooming with Beth Merino that night. At midnight our phone rang. It was Dan asking us to come to the lobby bar to have more drinks with him. We told him we were already asleep and would not be joining him. I actually told him that he should go to bed since we had a meeting the next day. He said, "We do?" I replied, "Yes, we do." I said Goodnight and hung up the phone. Immediately after this, Dan called our administrative assistant, Charmayne Rauch, up in her room and asked her to come down to the lobby bar to have drinks with him. Charmayne asked who else was going to be down there. He lied to Charmayne, telling her that Beth and Jaye would be coming down as well (after we told him NO). Charmayne joined him and was surprised and unhappy to find out that she was alone with him. Once there, she felt obligated to entertain him and stayed for a while although she really did not desire to do so. In his drunken state, Dan confessed to Charmayne that he was unhappy in his marriage. Charmayne felt extremely uncomfortable and confessed what happened to me in confidence later in the week. Again, Dan exhibited very unprofessional behavior.

January 24, 2002

Sales meeting in San Francisco, CA

Our team was scheduled to go out to dinner together. We had reservations at a restaurant for 7:00 p.m. and were to meet in the lobby at 6:30 p.m. At 6:30 p.m. Dan arrives in the lobby and announces to us ladies of the team that he, Bryan, and Tremell will be going out on their own and will see us the next day. Dan had asked Bryan and Tremell to go out with him that evening to strip clubs. Dan made the women of the team feel as though they weren't important. It was becoming more and more obvious to us that Dan favored the men of the team and that the only women he was interested in spending time with were those whose talents lied in swinging around poles on stages.

February 19, 2002

Telephone conversation between Jaye Ramirez and Dan Tubridy

I confirm with Dan that he received my e-mail suggestion for a new Long Term Care slogan for the national meeting. When he said that he did, I asked him "What did you think? Was it good?" Dan replied, "Yes Jaye, it was good. In fact, it was SO good, I have to ask you whether it is an original idea?" I felt completely insulted. I replied to

Dan, "How can you even ask me that?" I felt again as though he did not trust in me or believe me capable of being intelligent and/or creative enough to come up with an original idea.

April 1, 2002

In a telephone conversation with teammate, Bryan Zappulla, I learned that Dan, in response to a request from Bryan, is having Lilly pay to send Bryan to an upcoming American Society of Consultant Pharmacists conference in Las Vegas solely for the purpose of taking one of Bryan's customers who will be in attendance to a show. Dan is also planning on attending this show. Bryan was not one of the reps on our team chosen to win a "perk" trip this year, however Dan once again shows favoritism to the men of our team by sending Bryan on a company sponsored trip to help him build his relationship with his customer. The week prior I had actually asked Dan whether I could attend this conference since the President of the ASCP, Mark Sey, is actually one of my customers and beginning to speak for Lilly thanks to my intervention. The answer I received in response to my request to go to Vegas however was NO.

As it turns out, this trip ended up being a nightmare for Bryan, since this is the very trip where his wife, Angel Zappulla, died suddenly of an acute asthma attack. Bryan will tell you that upon return from that trip, Dan's unprofessionalism and complete lack of compassion was evident. Rather than being concerned about Bryan's mental health after this horrific tragedy, Dan was most concerned about how long Bryan was going to be out of the field and when he was coming back. In fact, the Monday after Bryan's wife died, Dan asked me by telephone whether I had talked to Bryan and if I knew when he was planning to return to the field. I found this to be appalling.

September 2002

I was given a specific dollar budget by Dan Tubridy of how much money I had to spend for expenses during Q3 of 2002. I stayed within that given budget, to the exact dollar. Just after the quarter ended, I was informed by Dan that because my expenses were not submitted and actually processed by EERS before the end of Q3, I had lost the money that was allotted to me and would have to use my allotted Q4 budget to pay for money I had spent in Q3. Because of Dan's mismanagement of our budget, I have been without any money to spend on customers during Q4. Perhaps had Dan not squandered Lilly monies earlier in the year flying reps on unnecessary trips and paying to take them to Gentleman's Clubs, we would have a little more money to spend on customers during Q4.

February 2003

Area meeting in Scottsdale, AZ. We all dressed up for the 70's themed reception our first night in town. Our team wore Afro wigs. Tremell Turner, who is African American, was sitting across the table from me at dinner. While Tremell in real life has no hair, this evening he was wearing an Afro wig like the rest of us. Dan was seated next to me. Halfway through dinner, Dan leaned over and said to me "I'll bet that's what Tremell looked like when he had hair... good thing he shaves his head!" I found this comment to be inappropriate, prejudiced, and rude. I did not reply to Dan's comment.

March 2003

This month Dan delivered a homemade presentation to the consultant pharmacists of my biggest customer, Neighborcare. The presentation was so biased, that I actually received an e-mail from Stephanie Ponedal, the lead consultant for Neighborcare, complaining about it. Stephanie said:

"Jaye, First, I need to let you know that the consultants were very unhappy with the presentation on Wednesday. My consulting group is very professional and ethical. They felt the presentation was extremely biased and did not take into account the various issues we need to deal with in our population."

Dan actually handed out a homemade upgrade recommendation letter (created by Jerry Windle of our Oakland territory) to the pharmacists. I took Stephanie out to lunch a couple of weeks later to apologize. She explained that the only reason she let us give a presentation that day was because of her respect for me and the knowledge that I would never deliver such a biased presentation. She said she was extremely disappointed with the unprofessionalism of the Lilly management team.

June 2003

I haven't documented anything in a while, but not because things do not continue to happen. I am simply tired. I have been extremely demotivated since the SPP process of last year during which I was made by Dan to be the scapegoat for this team's lack of motivation. I was accused of "leading" the team's bad attitude toward him. It is unfortunate that he cannot see he has accomplished this all on his own.

We just returned from a quota trip during which we all felt compelled to lie to Dan's wife, Meta, who asked several of us one-on-one about why she cannot reach Dan by telephone whenever he's out of town. She asked why we drag her husband out until 4 a.m. We tried to tell her that we do not go out with him and we do not know why she cannot reach him at all hours of the night when he is out of town. She replied by stating that either we are lying or he is. We all felt extremely uncomfortable. What kind of manager would put their employees in this position?

Overall, my two-year tenure with Lilly under the leadership of Dan Tubridy has been disappointing, at best. He is, in the entire length of my adult career, the most unprofessional, insensitive, demotivating manager I have ever worked with. He is an extremely poor communicator and does not like having "difficult" conversations with his subordinates. He seeks the negative in everyone and everything. He does not possess the values that Lilly proclaims to hold in utmost importance. While Dan has excellent analytical skills, he does not have the people skills required to lead a team. In fact, in my opinion, he is a "lawsuit waiting to happen."

This team is currently at high risk of losing many of its employees within the near future, primarily due to extremely poor leadership. I regret not having come forward earlier with this information, however fear of retribution has kept me silent. I am so completely demotivated and disappointed by my experience here at Lilly over the past 2.5 years, I no longer care.



"Ponedal, Stephanie"
<Stephanie.Ponedal@neighborcare.com>

03/07/2003 11:42 AM

To: "RAMIREZ_JAYE_J@LILLY.COM"
<RAMIREZ_JAYE_J@LILLY.COM>
cc: "Huhn, Scott" <Scott.Huhn@neighborcare.com>
Subject: FW: Re: Visit from Dr.Sumer Verma, May 2003

Jaye,

First, I need to let you know that the consultants were very unhappy with the presentation on Wednesday. My consulting group is very professional and ethical. They felt the presentation was extremely biased and did not take into account the various issues we need to deal with in our population.

Back to Dr. Verma, I discussed with the consultants and they thought a dinner in the Concord/Walnut Creek area would be a good idea and we could invite physicians and psychiatrists. Two or three of the consultants who live in the area could attend. It is really difficult to get all the consultants together outside of the consultant meeting. Most will not travel unless they absolutely have to since they are generally on the road all day for work.

I don't know what else you have for Dr. Verma, but if this sounds like something you want to pursue, we can talk.

Thanks,
Stephanie Ponedal

>From: RAMIREZ_JAYE_J@LILLY.COM
>To: Stephanie Ponedal <ponedal3@msn.com>
>Subject: Re: Visit from Dr.Sumer Verma, May 2003
>Date: Tue, 04 Mar 2003 20:44:58 -0500

>
>Stephanie,

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>Per the voicemail I left for you today, Dr. Sumer Verma (credentials
>listed below) will be in the Northern California Bay Area May 14 and is
>available for a lunch or dinner with the consultants of Neighborcare.

I
>will need to know right away, however, if you would like to work with
us

>to set something up. Lilly will pay for a meal for the consultants and
>for Dr. Verma's expenses, of course. We just need to lock in an
>approximate time... either lunchtime or dinnertime. Please let me know
if

>we can work something out ASAP. Thanks!

>
>Jaye Ramirez

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>=====

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>Sumer Verma, M.D.
>Psychiatrist in Charge, Special Care Dementia Unit, McLean
>Hospital, Belmont, MA
>Lecturer on Psychiatry, Harvard Medical School
>Associate Professor, Department of Psychiatry, Boston University School
of
>Medicine

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>Stephanie Ponedal <ponedal3@msn.com>
>02/25/2003 02:49 PM
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>
> To: RAMIREZ_JAYE_J@LILLY.COM
> cc:
> Subject: Re: Visit from Dr.Sumer Verma, May 2003
>
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>
>Hi Jaye,
>Is this still something you want to set up?
>Let me know.
>My NeighborCare e-mail is Stephanie.Ponedal@neighborcare.com
>Stephanie
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>
>>From: RAMIREZ_JAYE_J@LILLY.COM
>>To: Stephanie Ponedal <ponedal3@msn.com>
>>CC: COOLEY_MERINO_ELIZABETH_M@LILLY.COM, WINDLE_JERRY_C@LILLY.COM
>>Subject: Visit from Dr.Sumer Verma, May 2003
>>Date: Wed, 23 Oct 2002 13:56:46 -0500
>>
>>Stephanie,
>>
>>Per our phone conversation this morning, Dr. Sumer Verma (credentials
>>listed below) will be in the Northern California Bay Area May 14-16,
>>2003.
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>>
>> Sumer Verma, M.D.
>> Psychiatrist in Charge, Special Care Dementia Unit, McLean
>>Hospital, Belmont, MA
>> Lecturer on Psychiatry, Harvard Medical School
>> Associate Professor, Department of Psychiatry, Boston
University
>>School of Medicine
>>
>>We at Lilly would very much like to work with you and Neighborcare to
>>arrange a presentation to the consultants and pharmacists of
Neighborcare
>>during that time frame. Breakfast or lunch on Thursday, May 15th or
>>Friday, May 16th would be ideal.
>>
>>Please call or write me to discuss.
>>
>>Thanks!
>>
>>Jaye Ramirez
>>Neuroscience Specialist
>>Lilly Long Term Care
>>Stockton, CA
>>209-604-2649
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